

Ensuring Accurate and Meaningful Analysis of Water Supply Benefits Associated with the BDCP Alternatives

Contra Costa Water District is reviewing the recently released Effects Analysis and Administrative Draft EIS/EIR. They have identified problems with the integrity of the analysis of water supply benefits associated with the project alternatives. It appears that the consultants did not use appropriate baseline assumptions. This inherently skews conclusions about water delivery benefits (or detriments) attributed to the various alternatives compared with both (1) the status quo and (2) one another.

In both the EA and EIR/EIS the baseline assumptions for the “existing condition” **excludes** the required Fall X2 measures (but does include the other BiOp flow requirements). However, the No Action Alternative **does include** the Fall X2 measures.¹ Critically, the project alternatives arbitrarily include or exclude Fall X2, making it impossible to compare their impacts or effects on water supply deliveries.²

Specifically, it appears that the EIR/EIS substantially skews the analysis of water delivery impacts by using tougher environmental standards in analyzing smaller facilities,³ and loosening those standards in analyzing larger facilities.⁴ This has the effect of overstating the water supply benefits of larger alternatives, which will in turn over state the economic benefits of these alternatives.

Recommendation: BDCP must develop a **consistent** baseline and No Action Alternative for purposes of comparing the water supply impacts of different size facilities and different operational regimes. This consistent baseline should include:

- Fall X2
- Full compliance with existing regulatory requirements
- An accurate analysis of existing conditions.

¹ ADEIR/S, Chapter 5, p. 5-41, explains that while the Existing Conditions baseline does not include Fall X2, the No Action Alternative does include Fall X2.

² See BDCP ADEIR/S, Chapter 3, pp. 3-11 to 3-13, 3-23 to 3-25, and 3-116 to 3-132.

³ Operations of Scenario C, which is used for Alternative 5, defined in the BDCP ADEIR/S, Chapter 3, p. 3-127.

⁴ Operations of Scenario A, which is used for Alternative 1 - the “preliminary proposal” - defined in the BDCP ADEIR/S, Chapter 3, pp. 3-116 to 3-122.